

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 19 CR 279-1
v.)	
)	Honorable Sharon Johnson Coleman
)	
SEOK PHENG LIM)	

AGREED DEFENDANT’S MOTION TO MODIFY CONDITIONS OF BOND TO PERMIT
INTERNTIONAL TRAVEL AND TEMPORARY RETURN OF HER PASSPORT

Defendant, SEOK PHENG LIM, by the Federal Defender Program and its attorney, SERGIO F. RODRIGUEZ, with the agreement from the government, respectfully requests this Court enter an order modifying her conditions of bond, to allow her to travel to Singapore to be with her mother who is suffering from kidney failure and may not have long to live. Ms. Li would respectfully request that Pretrial Services temporarily return her passport and permission to travel from October 10, 2019 until November 10, 2019. In support, Defendant states as follows:

1. The Defendant, Seok Pheng Lim, was released on a \$50, 000 unsecured appearance bond by this Court on April 24, 2019. Dkt. 9. The bond allowed her to live in Pennsylvania and travel to New York and Illinois, but included the certain restrictions on her ability to travel outside of the country and the requirement that she surrender her passport to Pretrial Services. Dkt. 8. She is currently supervised by the Pretrial Services office in Maureen Harrity-Jones in Pennsylvania.

2. To date, Ms. Lim has been compliant with all of her conditions of release. Ms. Lim just recently was informed that her mother is suffering from kidney failure and may not have long to live. Her mother lives in Singapore. Ms. Lim respectfully requests permission from this Court to travel to Singapore to be with her mother during this time of pain. She would like to travel to be with her from October 10, 2019 until November 10, 2019. She is not scheduled to be before this Court until November 22, 2019 at 10:30 a.m. for a change of plea hearing. Ms. Lim requested permission from her Pretrial Services officer to temporarily get her passport back and be allowed to travel, but was informed that this can only be done with a court order modifying her current bond conditions,

3. Ms. Lim respectfully requests that her conditions of bond be modified to allow her to temporarily get her passport back and be allowed to travel to see her mother on the above listed dates.

4. Counsel spoke with the Assistant United States Attorney in this case, Sean Franzblau, who indicated that he has no objection to this motion.

5. Counsel also contacted Ms. Lim's Pretrial Services Officer in Pennsylvania, Maureen Harrity-Jones, who indicated that Ms. Lim has been in compliance with all her conditions, but that because her office is only doing a courtesy supervision for the Chicago office, the Chicago office would have to state their position on the motion. Counsel then called Pretrial Officer Tiffany Menard in the Chicago office and was informed that her office would not take a position as to foreign travel, but could point out that Ms. Lim has been very compliant with all conditions thus far.

WHEREFORE, for all the foregoing reasons, and, Ms. Lim respectfully requests that this motion be granted and that this Court enter an order for the temporary return of her passport and modifying her conditions of bond to allow her to travel to Singapore.

Respectfully submitted,

FEDERAL DEFENDER PROGRAM
John F. Murphy,
Executive Director

By: /s/ Sergio F. Rodriguez
Sergio F. Rodriguez
Attorney for Defendant

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CERTIFICATE OF SERVICE

The undersigned, Sergio F. Rodriguez, an attorney with the Federal Defender Program hereby certifies that in accordance with FED.R.CRIM. P. 49, FED. R. CIV. P. 5, LR5.5, and the General Order on Electronic Case Filing (ECF), the following document(s):

AGREED DEFENDANT'S MOTION TO MODIFY CONDITIONS OF BOND TO PERMIT INTERNATIONAL TRAVEL AND TEMPORARY RETURN OF HER PASSPORT

was served pursuant to the district courts ECF system as to ECF filings, if any, and were sent by first-class mail/hand delivery on September 30, 2019, to counsel/parties that are non-ECF filers.

By: /s/ Sergio F. Rodriguez
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